IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

MARCH 2024 GRAND JURY (Impaneled 03/22/2024)

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

MICHAEL R. PRELL, JR. a/k/a Struggle Mike a/k/a Struggle a/k/a JR

Violations:

Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2 (4 Counts)

COUNT 1 (Narcotics Conspiracy)

The Grand Jury Charges That:

From in or about early 2024, the exact date being unknown to the Grand Jury, and continuing to on or about September 26, 2024, in the Western District of New York, and elsewhere, the defendant, MICHAEL R. PRELL, JR., a/k/a Struggle Mike, a/k/a Struggle, a/k/a JR, did knowingly and willfully combine, conspire, and agree with others, known and unknown to the Grand Jury, to commit the following offenses, that is, to possess with intent to distribute, and to distribute, 5 kilograms or more of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Attempted Possession of 5 Kilograms or More of Cocaine with Intent to Distribute)

The Grand Jury Further Charges That:

On or about August 1, 2024, in the Western District of New York, the defendant, MICHAEL R. PRELL, JR., a/k/a Struggle Mike, a/k/a Struggle, a/k/a JR, did knowingly and intentionally attempt to possess with intent to distribute 5 kilograms or more of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT 3

(Attempted Possession of 5 Kilograms or More of Cocaine with Intent to Distribute)

The Grand Jury Further Charges That:

On or about September 25, 2024, in the Western District of New York, the defendant, MICHAEL R. PRELL, JR., a/k/a Struggle Mike, a/k/a Struggle, a/k/a JR, did knowingly and intentionally attempt to possess with intent to distribute 5 kilograms or more of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT 4

(Attempted Possession of 5 Kilograms or More of Cocaine with Intent to Distribute)

The Grand Jury Further Charges That:

On or about September 26, 2024, in the Western District of New York, the defendant, MICHAEL R. PRELL, JR., a/k/a Struggle Mike, a/k/a Struggle, a/k/a JR, did knowingly and intentionally attempt to possess with intent to distribute 5 kilograms or more of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

DATED: Buffalo, New York, March 20, 2025.

MICHAEL DIGIACOMO United States Attorney

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A TRUE BILL:

S/FOREPERSON FOREPERSON